

EXHIBIT 3

From: Helen Chaitman
To: [Shifrin, Maximillian S.](#)
Subject: RE: Proposed Stipulation
Date: Wednesday, August 09, 2017 11:38:25 AM
Attachments: image001.jpg
image002.jpg
image003.jpg

Okay. It's fine to submit it.

Helen Davis Chaitman
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Cell: (908) 303-4568
Fax: (888) 759-1114

From: Shifrin, Maximillian S. [mailto:mshifrin@bakerlaw.com]
Sent: Wednesday, August 09, 2017 11:38 AM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Subject: RE: Proposed Stipulation

Helen,

That paragraph is only meant to preserve our respective arguments/positions on the case management dates and ensure that the stipulation is not considered a waiver of those positions. It's meant to apply to both sides and not intended to be anything controversial.

Happy to discuss if you'd like.

Max

From: Helen Chaitman [mailto:hchaitman@chaitmanllp.com]
Sent: Tuesday, August 08, 2017 5:58 AM
To: Shifrin, Maximillian S.
Subject: RE: Proposed Stipulation

Max: This is fine except I have no idea what the third paragraph is intended to protect. Why do you need that paragraph?

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From: Shifrin, Maximillian S. [mailto:mshifrin@bakerlaw.com]
Sent: Monday, August 07, 2017 9:52 AM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Subject: Proposed Stipulation

Helen,

Given the unique procedural posture we are currently in as a result of the ongoing Madoff deposition and the forthcoming omnibus fraud proceeding, we propose that we enter into the attached stipulation that should provide all parties with adequate protection under the operative case management notices. I think the terms of the stipulation are self-explanatory, but I suggest we have a brief call to discuss any potential issues. Are you free at all today?

Thanks,
Max

Maximillian S. Shifrin
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